

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,)	<u>INFORMATION</u>
)	
Plaintiff,)	JUDGE
)	
v.)	CASE NO.
)	
)	
JAMES OPPERMANN)	Title 18, United States Code,
)	Section 371
)	
Defendant.)	

The United States Attorney charges:

COUNT 1

(CONSPIRACY TO BRIBE A PUBLIC OFFICIAL IN VIOLATION OF TITLE 18,
UNITED STATES CODE, SECTION 1951: 18 U.S.C. § 371)

General Allegations

1. At all times relevant to the Information, Defendant JAMES OPPERMANN owned and operated Richmond Valve and Pipe, a company that engaged in interstate commerce and that was located at 250 Richmond Road in Cleveland, Ohio. Defendant obtained contracts for Richmond Valve and Pipe to supply the City of Cleveland Water Division with water materials. Under this contract, Richmond Valve and Pipe supplied valves, pipe and other materials to the Water Division at a certain price. From time to time, Richmond Valve and Pipe also obtained emergency contracts with the City.

2. At all times relevant to the Information, Norman Gore, not charged herein, was employed by the City of Cleveland as a Supervisor of the Harvard Yard facility of the Water Department. In that capacity, he had the authority to approve payments of large sums of City funds to numerous contractors with little or no oversight, and to select contractors to perform on emergency contracts.

3. At all times relevant to the Information, the operations of Richmond Valve and Pipe involved and affected interstate commerce as did the Water Division of the City of Cleveland, which provided water utility services to Cleveland residents and the surrounding communities.

4. Beginning in or about 1999 and continuing until in or about 2003, the exact dates being unknown to the United States Attorney, in the Northern District of Ohio, Eastern Division and elsewhere, JAMES OPPERMANN, the Defendant herein, Norman Gore and others known and unknown to the United States Attorney, did knowingly and willfully conspire, combine, confederate and agree with each other to obstruct, delay and

affect commerce and the movement of goods and commodities in commerce in that Norman Gore, under color of official right, obtained bribes of money and property from Defendant JAMES OPPERMANN, with his consent, in violation of Title 18, United States Code, Sections 1951 and 2.

MEANS AND METHODS

5. It was part of the conspiracy that OPPERMANN and Norman Gore agreed that OPPERMANN would pay Gore in exchange for Gore processing the paperwork necessary for Richmond Valve and Pipe to be paid on its contract with the City.

6. It was a further part of the conspiracy that Gore would and did request and that OPPERMANN would and did pay Gore over one half of the Richmond Valve and Pipe profits on two emergency contracts.

7. It was a further part of the conspiracy that, as a result of the bribes paid to Gore, Richmond Pipe and Valve received at least \$37,000 in profit from late 1999 through the end of 2002.

OVERT ACTS

8. In furtherance of the conspiracy and to achieve its ends, Defendant JAMES OPPERMANN and others known and unknown to the United States Attorney committed the following overt acts, among others, in the Northern District of Ohio and elsewhere:

9. On last five occasions between late 1999 and the end of 2002, OPPERMANN paid Gore several hundred dollars in cash in exchange for Gore's official acts.

10. On one occasion between 1999 and 2002, at Gore's request, OPPERMANN purchased a computer at Sam's Club and gave it to Gore.

11. On one occasion between 1999 and the end of 2002, OPPERMANN paid Gore approximately \$4500 in cash in installments in exchange for Gore choosing Richmond Valve and Pipe for an emergency contract.

12. On one occasion after the \$4500 payment described above, OPPERMANN paid Gore approximately \$2500 in cash in installments in exchange for Gore choosing Richmond Valve and Pipe for an emergency contract.

All in violation of Title 18, United States Code, Section 371.

Gregory A. White
United States Attorney